Remarks

Status of the Subject Application

The Examiner objected to the Title of the subject Application, opining that the current Title is not descriptive. The Examiner also objected to the Abstract of the Subject Application, opining that the Abstract fails to describe the disclosure sufficiently to assist readers in deciding whether there is a need for consulting the full patent text for details.

The Examiner rejected claims 1-8 under 35 U.S.C. §101, opining that the claimed invention is directed to the non-statutory subject matter of an abstract idea and further rejected claims 1-8 under 35 U.S.C. §102, opining those claims are anticipated by Linkens et al. *Design and Implementation of a Knowledge-Based Framework for the Modelling* (sic) *and Simulation of Hybrid Systems* (hereinafter "Linkens").

Title Objection

Applicants submit that the Title is descriptive of the invention described in the specification and recited in the pending claims. Applicants, accordingly, request that the Examiner withdraw that objection.

Abstract Objection

Applicants submit an amended Abstract herewith and further submit that the revised Abstract describes the disclosure sufficiently to assist readers in deciding whether there is a need for consulting the full patent text for details. Applicants, accordingly, request that the Examiner withdraw that objection.

Claim Rejections Under 35 U.S.C. §101

Applicants submit that the pending claims are directed to a machine that produces a concrete, practical, and tangible result and so are directed to statutory subject matter and, accordingly, request that the Examiner withdraw that objection.

Claim Rejections Under 35 U.S.C. § 102

Linkens discloses a hybrid simulation based on the concurrent execution of the G2 continuous simulator, the G2 inference engine and the Grafcet simulator, wherein the G2 real-time database serves as a data exchange mechanism between the three simulators. *See* section 2.2. The "G2 real-time Expert System" is said to provide tools for "object-orientation, Rule-based programming, hierarchical modelling (sic), the codification of procedures, and the construction of continuous equations." *See* first paragraph of Section 3. Applicants submit that Linkens does not disclose the elements of the pending claims.

Conclusion

Applicants respectfully submit that claims 9-43 are in condition for allowance. Accordingly, reconsideration of the present objections and rejections and passage to allowance of claims 9-43 at an early date are earnestly solicited. If the Examiner is of the opinion that the instant application is in condition for disposition other than allowance, the Examiner is respectfully requested to contact Applicant's Attorney at the telephone number listed below so that any concerns may be expeditiously addressed.

Respectfully Submitted

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